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January 27, 2015

VIA ECF

Hon. George B. Daniels
United States District Judge
United States District Court
for the Southern District of New York
500 Pearl Street
New York, New York 10007-1312

Re: *Sokolow, et al. v. Palestine Liberation Organization, et al.*
Docket No. 04-CV-397 (GBD)(RLE)

Dear Judge Daniels:

I write in response to defendants' letter objecting to the testimony of Dr. Tuvia Peri and Dr. Rael Strous' testimony on Shaul Mandelkorn . DE 767. We respectfully ask that the Court permit the testimony in limited form.

1. Dr. Peri.

Dr. Peri, who has arrived in New York from Israel despite the severe winter weather, will testify about two topics: (1) the causal link between the June 19 bombing and the injuries of plaintiff Leonard Mandelkorn, which include not only the immediate trauma of his son's injuries, but also the long-term injuries suffered by Leonard Mandelkorn as a result of his son's severe post-traumatic stress disorder; and (2) the professional reputation of Scott (Yechezkel) Goldberg.

Both of these topics are relevant to disputed fact issues. Defendants' own experts contend that (1) the injuries of Mr. Mandelkorn's son were not caused by the bombing but rather by an underlying disorder; and (2) that the Goldberg family's damages are unsupportable.

We expect Dr. Peri's testimony to be about a half-hour.

2. Dr. Strous.

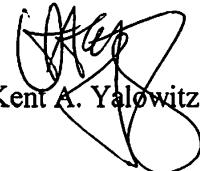
Dr. Strous will also testify briefly concerning Mr. Mandelkorn's son for the limited purpose of putting into context his testimony about Leonard Mandelkorn's

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injuries. Dr. Strous' testimony concerning the injuries of Mr. Mandelkorn's son will likewise last less than a half-hour.

Respectfully,



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cc: All ECF Counsel